

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE

<p><b>FUSION ELITE ALL STARS, et al.,</b> v. <b>VARSITY BRANDS, LLC, et al.,</b></p> <p>Plaintiffs, Defendants.</p>	<p>Case No. 2:20-cv-02600-SHL-cgc</p> <p><b>JURY TRIAL DEMANDED</b></p>
<p><b>JONES, et al.,</b> v. <b>BAIN CAPITAL PRIVATE EQUITY, et al.,</b></p> <p>Plaintiffs, Defendants.</p>	<p>Case No. 2:20-cv-02892-SHL-cgc</p> <p><b>JURY TRIAL DEMANDED</b></p>
<p><b>AMERICAN SPIRIT AND CHEER ESSENTIALS, INC., et al.,</b> v. <b>VARSITY BRANDS, LLC, et al.,</b></p> <p>Plaintiffs, Defendants.</p>	<p>Case No. 2:20-cv-2782-SHL-cgc</p> <p><b>JURY TRIAL DEMANDED</b></p>

**DECLARATION OF KATHERINE VAN DYCK IN SUPPORT OF  
PLAINTIFFS' JOINT MOTION TO FACILITATE COORDINATION OF  
DEPOSITIONS IN THE RELATED ACTIONS**

I, Katherine Van Dyck, declare the following under penalty of perjury:

1. I am an attorney with the law firm of Cuneo Gilbert & LaDuca LLP, counsel for Plaintiffs, and Interim Co-Lead Counsel for Direct Purchasers in the above-captioned matter. I make this affidavit on personal knowledge and review of my files, except as otherwise indicated.

I submit this declaration in support of Plaintiffs' Joint Motion to Facilitate Coordination of Depositions in the Related Actions, filed contemporaneously herewith.

2. Attached as Exhibit 1 is a true and correct copy of an e-mail sent by Steven J. Kaiser, counsel for Defendants Varsity Brands, LLC, Varsity Spirit, LLC, and Varsity Spirit Fashion & Supplies, LLC, to undersigned and various other counsel appearing in the above-captioned matters on October 1, 2021.

3. Attached as Exhibit 2 is a true and correct copy of a Stipulation and Order re Deposition Protocol entered by U.S. District Judge Maxine M. Chesney on November 6, 2020 in the matter of *In re Hard Drive Suspension Assemblies Antitrust Litig.*, No. 19-md-02918, Dkt. 287 (N.D. Cal.).

4. Attached as Exhibit 3 is a true and correct copy of a Joint Stipulation and Discovery Coordination Order entered by U.S. District Judge Gonzalo P. Curiel on January 24, 2018 in the matter of *In re Qualcomm Antitrust Litig.*, No. 17-md-02773, Dkt. 305 (N.D. Cal.).

5. Attached as Exhibit 4 is a true and correct copy of an Order Amending Discovery and Case Management Protocol entered by Special Master Charles Legge on June 17, 2013 in the matter of *In re Cathode Ray Tube (CRT) Antitrust Litig.*, No. 07-cv-05944, Dkt. 1738 (N.D. Cal. June 17, 2013).

Executed this 19th day of October, 2021 in Washington, DC.

s/ Katherine Van Dyck  
Katherine Van Dyck